

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

United States of America,

Criminal No. 19-cr-20498

Honorable Paul D. Borman

v.

Violations:

D-1 Alex Albert Castro,
also known as "Sniper,"

18 U.S.C. § 1111(a)

D-2 Jason Dale Kechego,
also known as "J," and

18 U.S.C. § 1117

D-3 Adam Taylor Wright,
also known as "Creeper,"

18 U.S.C. § 113(a)

18 U.S.C. § 111(a)(1)

Defendants.

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FIRST SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At all times relevant to this First Superseding Indictment:

1. Milan Correctional Institution ("FCI Milan") was a federal correctional institution with a detention center located in Milan, Michigan, and operated by the Federal Bureau of Prisons.

2. FCI Milan was a facility within the special maritime and territorial jurisdiction of the United States as defined in Title 18, United States Code, Section 7(3).

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3. Defendants ALEX ALBERT CASTRO, also known as “Sniper” (“CASTRO”), JASON DALE KECHEGO, also known as “J” (“KECHEGO”), and ADAM TAYLOR WRIGHT, also known as “Creeper” (“WRIGHT”) were inmates housed in the East Unit of FCI Milan’s detention center.

4. Christian Maire (“Maire”) and Michal Figura (“Figura”) were inmates and cellmates housed in the East Unit of FCI Milan’s detention center.

5. Joseph Raphael (“Raphael”) was an inmate housed in the East Unit of FCI Milan’s detention center.

6. Craig Evans (“Evans”) was an inmate housed in the East Unit of FCI Milan’s detention center.

COUNT ONE
(18 U.S.C. §§ 1111(a), 2 –
First Degree Premeditated Murder, Aiding and Abetting)

D-1 Alex Albert Castro,
also known as “Sniper”

D-2 Jason Dale Kechego,
also known as “J”

D-3 Adam Taylor Wright
also known as “Creeper”

7. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

8. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,”

JASON DALE KECHEGO, also known as “J,” and ADAM TAYLOR WRIGHT, also known as “Creeper,” did willfully, deliberately, maliciously, and with premeditation and malice aforethought, unlawfully kill Christian Maire, by stabbing, beating, kicking, and stomping him, and then throwing him down the stairs, all in violation of Title 18, United States Code, Section 1111(a), and did aid and abet one another in the commission of said unlawful murder, in violation of Title 18, United States Code, Section 2.

COUNT TWO
(18 U.S.C. § 1117 –
Conspiracy to Commit First Degree Premeditated Murder)

D-1 Alex Albert Castro,
also known as “Sniper”
D-2 Jason Dale Kechego,
also known as “J”
D-3 Adam Taylor Wright
also known as “Creeper”

9. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

10. On or about January 2, 2019, in the Eastern District of Michigan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” JASON DALE KECHEGO, also known as “J,” and ADAM TAYLOR WRIGHT, also known as “Creeper,” did knowingly and intentionally combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1111(a).

Overt Acts

11. In furtherance of the conspiracy, and to effect its object, one or more of the conspirators committed the following acts, among others, on January 2, 2019:

12. Prior to 8:32 p.m., defendants CASTRO, KECHEGO, and WRIGHT discussed and agreed to “kill the chomos.”

13. Prior to 8:32 p.m., defendant CASTRO obtained a homemade knife, commonly called a “shank,” with the intent to use said shank to kill Christian Maire and Michal Figura;

14. Defendant CASTRO walked upstairs to the cell of Christian Maire and Michal Figura;

15. Defendant KECHEGO followed CASTRO and walked upstairs to the cell of Christian Maire and Michal Figura;

16. Defendant WRIGHT followed CASTRO and KECHEGO and walked upstairs to the cell of Christian Maire and Michal Figura;

17. Defendant CASTRO entered the cell of Christian Maire and Michal Figura with a shank in his hand and said, “So you guys are the chomos!”

18. Defendant CASTRO attempted to stab and did stab Michal Figura with a shank multiple times;

19. Defendant CASTRO kicked, punched, and stomped Michal Figura multiple times;

20. Defendant KECHEGO kicked, punched, and stomped Michal Figura multiple times;

21. Defendant WRIGHT kicked, punched, and stomped Michal Figura multiple times;

22. Defendant KECHEGO grabbed Christian Maire as he attempted to flee the assault and tried to drag Maire back into his cell;

23. Defendant WRIGHT kicked Christian Maire as Maire tried to get away from defendants CASTRO and KECHEGO;

24. Defendant CASTRO kicked, punched and stomped Christian Maire multiple times;

25. Defendant KECHEGO kicked, punched and stomped Christian Maire multiple times;

26. Defendant WRIGHT kicked, punched and stomped Christian Maire multiple times;

27. Defendant CASTRO stabbed Christian Maire multiple times with a shank while yelling, "Die, motherfucker, die!"

28. Defendants KECHEGO and WRIGHT dragged Christian Maire away from his cell so that they could continue to assault him;

29. Defendant WRIGHT kicked Christian Maire's head multiple times;

30. Defendant KECHEGO stomped Christian Maire's head;

31. Defendant WRIGHT confronted and chased Correctional Officer Ryan Greenleaf to prevent him from stopping the defendants' assaults upon Christian Maire and Michal Figura;

32. Defendant WRIGHT punched Nurse Clinton White once, striking him in the face and neck, to prevent Nurse White from stopping the defendants' assaults upon Christian Maire and Michal Figura;

33. Defendants CASTRO, KECHEGO, and WRIGHT worked together to drag Christian Maire across the floor and then threw his body down a flight of stairs.

All in violation of Title 18, United States Code, Section 1117.

COUNT THREE
(18 U.S.C. §§ 113(a)(1), 2 –
Assault with Intent to Commit Murder; Aiding and Abetting)

D-1 Alex Albert Castro,
also known as "Sniper"

D-2 Jason Dale Kechego,
also known as "J"

D-3 Adam Taylor Wright
also known as "Creeper"

34. The allegations in paragraphs 1 through 4 of the General Allegations are incorporated into this count by reference.

35. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” JASON DALE KECHEGO, also known as “J,” and ADAM TAYLOR WRIGHT, also known as “Creeper,” did assault Michal Figura, with intent to commit murder by beating, kicking and stabbing him, in violation of Title 18, United States Code, Section 113(a)(1), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18, United States Code, Section 2.

COUNT FOUR
(18 U.S.C. §§ 113(a)(6), 2 –
Assault Resulting in Serious Bodily Injury; Aiding and Abetting)

D-1 Alex Albert Castro,
also known as “Sniper”
D-2 Jason Dale Kechego,
also known as “J”
D-3 Adam Taylor Wright
also known as “Creeper”

36. The allegations in paragraphs 1 through 3 and 5 of the General Allegations are incorporated into this count by reference.

37. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” JASON DALE KECHEGO, also known as “J,” and ADAM TAYLOR WRIGHT, also known as “Creeper,” did assault Joseph Raphael, resulting in serious bodily injury, in violation of Title 18, United States Code, Section 113(a)(6), and did aid

and abet one another in the commission of said unlawful assault, in violation of Title 18 United States Code, Section 2.

COUNT FIVE
(18 U.S.C. §§ 113(a)(6), 2 –
Assault Resulting in Serious Bodily Injury; Aiding and Abetting)

D-1 Alex Albert Castro,
also known as “Sniper”

D-2 Jason Dale Kechego,
also known as “J”

D-3 Adam Taylor Wright
also known as “Creeper”

38. The allegations in paragraphs 1 through 3 and 6 of the General Allegations are incorporated into this count by reference.

39. On or about January 2, 2019, in the Eastern District of Michigan, at FCI Milan, defendants ALEX ALBERT CASTRO, also known as “Sniper,” JASON DALE KECHEGO, also known as “J,” and ADAM TAYLOR WRIGHT, also known as “Creeper,” did assault Craig Evans, resulting in serious bodily injury, in violation of Title 18, United States Code, Section 113(a)(6), and did aid and abet one another in the commission of said unlawful assault, in violation of Title 18 United States Code, Section 2.

COUNT SIX
(18 U.S.C. § 111(a)(1) and (b) –
Assaulting, Resisting, or Impeding a Federal Employee)

D-3 Adam Taylor Wright,
also known as “Creeper”

40. On or about January 2, 2019, in the Eastern District of Michigan, defendant ADAM TAYLOR WRIGHT, also known as “Creeper,” did forcibly assault, resist, oppose, impede, intimidate, and interfere with Clinton White, a nurse employed by the Federal Bureau of Prisons at FCI Milan, while Clinton White was engaged in and on account of the performance of his official duties, and did thereby inflict bodily injury upon Clinton White by punching him in the face and neck, all in violation of Title 18, United States Code, Section 111(a)(1) and (b).

COUNT SEVEN
(18 U.S.C. § 111(a)(1) –
Impeding a Federal Officer)

D-3 Adam Taylor Wright,
also known as “Creeper”

41. On or about January 2, 2019, in the Eastern District of Michigan, defendant ADAM TAYLOR WRIGHT, also known as “Creeper,” did forcibly oppose, impede, intimidate, and interfere with Ryan Greenleaf, a Correctional Officer with the Federal Bureau of Prisons at FCI Milan, while Officer Greenleaf

was engaged in and on account of the performance of his official duties, in violation of Title 18, United States Code, Section 111(a)(1).

THIS IS A TRUE BILL

s/Grand Jury Foreperson

GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

CRAIG WININGER
Chief, Violent & Organized Crime Unit

s/Frances Lee Carlson
FRANCES LEE CARLSON
ANDREW R. PICEK
Assistant United States Attorneys

Dated: March 24, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number: 19-cr-20498
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based on LCrR 57.10(b)(4) ¹ :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>FLC</i>

Case Title: USA v. Alex Albert Castro, et al

County where offense occurred: Washtenaw

Offense Type: Felony

Superseding Indictment -- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: 19-cr-20498 Judge: Paul D. Borman

Reason:

Corrects errors and amends certain charges; no additional charges or defendants

Describe Change:

Removes statutory factors for death penalty; corrects factual errors; charges different subsection of assault; reorders counts

Defendant Name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case

March 24, 2021

Date



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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated

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